

UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In re: Richard Burton Paul Monroe

Case No. 22-41504
Chapter 13

Debtor.

**DEBTORS RESPONSE TO THE TRUSTEE'S MOTION TO DISMISS CHAPTER 13
PLAN**

Debtor, comes now, through his undersigned counsel, for his response to the Chapter 13 Trustee's Motion to Dismiss his pending Chapter 13 filing, states the following:

1. Debtor is not intentionally failing to make his trustee payments.
2. Debtor expects to be able to begin trustee payments beginning in September, 2023 after a modified plan is filed or to file a conversion to a Ch 7.
3. Dismissal of the case would be to the detriment of the creditors as the debtor is attempting to make a good faith effort to pay back his debt.
4. Debtor would like to propose the following:
 - a. Debtor requests the Court grant a continuance of the pending Motion to Dismiss hearing, so he may file a modified plan and amend schedules I & J or a conversion to Ch 7.

WHEREFORE, the debtor requests that the Court grant the following relief:

1. Enter an order consistent with the above proposal; and
2. For other relief the Court believes is just and appropriate.

Dated: August 23, 2023

LIFEBACK LAW FIRM, P.A.

/e/ JESSE A. HOROSHAK #0387797

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